

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARIA FERNANDA CASTELLANOS  
RAMIREZ, ROSA CARRASCO, CLAUDIA  
MARCHAN TORRES, MIJENTE SUPPORT  
COMMITTEE, ORGANIZED  
COMMUNITIES AGAINST  
DEPORTATIONS,

Plaintiffs,

v.

LEXISNEXIS RISK SOLUTIONS,

Defendant.

Case No. 22-cv-05384

**JOINT STATUS REPORT**

Plaintiffs Maria Fernanda Castellanos Ramirez, Rosa Carrasco, Claudia Marchan Torres, Mijente Support Committee, and Organized Communities Against Deportations (“OCAD”) (collectively, “Plaintiffs”), and Defendant LexisNexis Risk Solutions (“LexisNexis Risk”) file this Joint Initial Status Report regarding how discovery is proceeding, pursuant to this Court’s November 15, 2022 Order. ECF No. 32.

**Summary of Discovery Exchange to Date**

1. On November 16, 2022, this Court issued a stay of electronically stored information and oral discovery. ECF No. 32.
2. On December 13, 2022, the Parties exchanged their initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) and this Court’s November 16, 2022 Order. ECF No. 32.
3. On February 1, 2023, Plaintiffs served their first set of requests for production and interrogatories on Defendant.

4. On February 10, 2023, Defendant served its first set of requests for production on Plaintiffs. That same day, the Parties conferred via email and agreed to the following additional conditions regarding the February discovery requests.

A. The Parties agreed to provide 30-day extensions on each set of responses. Defendant's responses to all requests are due April 3, 2023, and Plaintiffs' responses are due April 11, 2023.

B. In the event the case is dismissed before April 1, 2023 with leave to replead from the Court, Defendant will still follow the April 3, 2023 deadline for the responses to the February 1, 2023 requests.

C. The Parties reserve the right to assert objections in responses based on any ruling from the Court.

5. The Parties are preparing responses to these requests and will confer if necessary to resolve any issues.

Dated: March 21, 2023

Respectfully submitted,

/s/ Dinesh McCoy

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**Certificate of Service**

I hereby certify that on the 21st day of March, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system.

/s/ Thomas F. McAndrew

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